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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MILLICENT WANJOHI,
Plaintiff,

vs.

GEICO GENERAL INSURANCE
COMPANY; DOE INDIVIDUALS I-X,
inclusive; and ROE CORPORATIONS I-X,
inclusive,
Defendants.

CASE NO.: 2:17-CV-02902-GMN-VCF

**STIPULATION AND ORDER TO EXTEND
SCHEDULED DISCOVERY DEADLINES
(FIRST REQUEST)**

The parties hereto, by and through their undersigned counsel of record, hereby stipulate to extend the time for discovery in this matter. This is the first request for such extension.

I.

CURRENT SCHEDULING ORDER DATES

Plaintiff's case has not yet been set for a jury trial. The current discovery deadlines are based off of a stipulated discovery plan, which was submitted in compliance with LR 26-1(e) on January 12, 2018. A scheduling order, based on this plan, was entered on January 16, 2018. Pursuant to this order, the current discovery deadline dates are:

- Fed. R. Civ. P. 26(a)(1) Initial Disclosures: January 29, 2018
- Final Date to Amend Pleadings or Add Parties: February 12, 2018
- Final Date for Initial Expert Disclosures: March 12, 2018

- 1 • Final Date for Rebuttal Expert Disclosures: April 16, 2018
- 2 • Close of Discovery: May 14, 2018
- 3 • Final Date for Dispositive Motions: June 11, 2018
- 4 • Final Date for Pretrial Order: July 9, 2018

5 **II.**

6 **STATEMENT OF COMPLETED DISCOVERY**

7 The Parties have completed their initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1).
8 These were completed by both parties on or before the January 29, 2018, deadline, in compliance
9 with the current scheduling order.

10 **III.**

11 **DESCRIPTION OF DISCOVERY THAT REMAINS TO BE COMPLETED**

12 The Parties need to complete written discovery, deposition discovery, initial expert
13 discovery, and rebuttal expert discovery.

14 **IV.**

15 **GOOD CAUSE FOR EXTENSION OF REMAINING DEADLINES**

16 Since the initial case conference on December 15, 2017, the Parties have attempted in
17 good faith to remove and/or resolve this action through alternative dispute resolution methods.
18 The Parties initially discussed the possibility of removing this action to binding arbitration,
19 however, the Parties were unable to reach a negotiated arbitration agreement. The Parties
20 subsequently discussed the possibility of resolving this action through mediation, however, the
21 Parties were unable to reach a negotiated mediation agreement. Throughout this approximately
22 six-week period, the Parties did not conduct any discovery, other than initial disclosures, as it
23 was expected that the action would either be resolved or removed to arbitration.

24 During the week of January 29, 2018, the Parties agreed that further attempts at
25 alternative dispute resolution would be unproductive for the time being. The Parties now intend
26 to actively pursue discovery in this Court, the close of discovery is just over three months away,
27 and the initial expert disclosure deadline is just over one month away. The Parties agree that, no
28 matter how diligent and active their efforts, this is insufficient time to conduct all necessary and

1 meaningful discovery. The Parties further expect that thorough and meaningful discovery may
2 lead to a breakthrough regarding alternative dispute resolution possibilities.

3 **V.**

4 **PROPOSED SCHEDULE FOR COMPLETING REMAINING DISCOVERY**

5 Based on the foregoing, the Parties respectfully request that this Court grant a five-week
6 extension of the remaining discovery deadlines, except for the final date to amend pleadings or
7 add parties, which is less than 21 days from now (*see* LR 26-4). This would result in the
8 following deadlines:

- | | | |
|----|---|-------------------|
| 9 | • Final Date to Amend Pleadings or Add Parties: | February 12, 2018 |
| 10 | • Final Date for Initial Expert Disclosures: | April 16, 2018 |
| 11 | • Final Date for Rebuttal Expert Disclosures: | May 21, 2018 |
| 12 | • Close of Discovery: | June 18, 2018 |
| 13 | • Final Date for Dispositive Motions: | July 16, 2018 |
| 14 | • Final Date for Pretrial Order: | August 13, 2018 |

15
16 Dated this 7th of February, 2018.

Dated this 7th of February, 2018.

17 RICHARD HARRIS LAW FIRM

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24 **IT IS SO ORDERED.**

25 Dated this 12th of February, 2018.

26 If dispositive motions are filed, the
27 deadline for filing the joint pretrial order
28 will be suspended until 30 days after
decision on the dispositive motions or
further court order.


UNITED STATES MAGISTRATE JUDGE